

THE HONORABLE LAUREN KING

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LEO'S WELDING and FABRICATION, LLC, a
Washington limited liability company

Case No. 2:25-cv-00625 LK

Plaintiff,

v.

**STIPULATION OF
THE PARTIES FOR THE
GIVING OF SPECIAL BOND**

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK LOGISTICS,
LLC, an Alaska limited liability company dba
NORTHLINE SEAFOODS *in personam*

Defendants.

WHEREAS, LEO'S WELDING and FABRICATION, LLC ("Plaintiff") having
filed a Verified Complaint on or about April 8, 2025 against the Defendant vessel
HANNAH, O.N. 1067457 ("vessel") and having obtained an Order from the Court for the
issuance of a warrant for the arrest of the Vessel;

WHEREAS, SAYAK LOGISTICS, LLC ("Defendant") having filed its claim of
ownership to the Vessel;

NOW, THEREFORE, it is stipulated and agreed that Defendant, upon giving and
filing a special bond as detailed below pursuant F.R.C.P. Rule E(5)(a), the Court's Order
for Warrant for the Arrest of the Vessel can be stayed pending further order of the Court
as follows:

1. Defendant will file a Special Bond of ONE MILLION THREE HUNDRED

SEVENTY EIGHT THOUSAND DOLLARS (USD \$1,378,000.00) (the

1. "Security"), with the Clerk of Court for the United States District Court for
2. the Western District of Washington contemporaneous with the filing of this
3. Stipulation.
4. 2. The Special Bond shall serve as substitute res for the Vessel. Plaintiff accepts
5. the Special Bond as substitute res for the Vessel.
6. 3. The posting of the Security will not be construed as any admission of liability,
7. amount or other issue by Defendant.
8. 4. The posting of the special bond by Defendant is given without prejudice to,
9. and under a full reservation of, any and all rights or defenses available to
10. Defendant, and the special bond by Defendant to Plaintiff is also given in
11. consideration for Plaintiff's consent to the Court's stay of the Order for
12. issuance of the Warrant for Arrest of the Vessel from arrest and for Plaintiff
13. refraining from arresting, attaching or otherwise detaining the Vessel for the
14. maritime lien claim of Plaintiff against the Vessel.

15. IT IS SO STIPULATED.

16. DATED this 10th day of May, 2025.

17. /s/ Michael A. Barcott
18. Michael A. Barcott, WSBA #13317

19. /s/ John E. Casperson
John E. Casperson, WSBA #14292

20. /s/ Daniel P. Barcott
21. Daniel P. Barcott, WSBA #50282

22. Holmes Weddle & Barcott, PC
3101 Western Ave, Suite 500
Seattle, WA 98121
23. Email: mbarcott@hwb-law.com
jcasperson@hwb-law.com
24. dbarcott@hwb-law.com
25. Attorneys for Defendant Sayak Logistics,
26. LLC d.b.a. Northline Seafoods

/s/ Brian C. Zuanich
Brian C. Zuanich, WSBA #43877

/s/ Robert Zuanich
Robert Zuanich, WSBA #9581

Zuanich Law PLLC
U.S. Bank Center
1420 5th Avenue, Suite 2200
Seattle, WA 98101
Email: brian@zuanichlaw.com
rpz@zuanichlaw.com
Attorneys for Plaintiff

1. **CERTIFICATE OF SERVICE**

2. The undersigned certifies under penalty of perjury
3. of the laws of the State of Washington that, on the
4. 10th day of May 2025, at Seattle, WA, the foregoing was
electronically filed with the Clerk of Court using the CM/ECF
system, which will send notification of such filing to the following:

5. Attorneys for Plaintiff:

Brian C. Zuanich, WSBA #43877 - brian@zuanichlaw.com
6. Robert Zuanich, WSBA #9581- rpz@zuanichlaw.com
7. Zuanich Law PLLC, 1420 5th Avenue, Ste. 2200, Seattle, WA 98101

8. s/ Alegria S. Forman

Alegria S. Forman